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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

LOU BAKER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SEAWORLD ENTERTAINMENT,
INC., et al.,

Defendants.

Case No.: 14-cv-2129-MMA-AGS

CLASS ACTION

**SUPPLEMENTAL
DECLARATION OF ED
BARRERO REGARDING:
(A) MAILING OF POSTCARD
NOTICE AND NOTICE;
(B) UPDATE ON CALL CENTER
SERVICES AND SETTLEMENT
WEBSITE; AND (C) REPORT ON
CLAIMS RECEIVED TO DATE**

1 I, Ed Barrero, declare and state as follows, pursuant to 28 U.S.C. § 1746:

2 1. I am a Senior Project Manager employed by Epiq Class Action &
3 Claims Solutions, Inc. (“Epiq”). Pursuant to the Court’s Order Granting Class
4 Representatives’ Unopposed Motion for Preliminary Approval of Class Action
5 Settlement and Authorizing Dissemination of Notice of the Settlement to the Class
6 entered on February 19, 2020 (ECF No. 518), Class Counsel were authorized to
7 retain Epiq in connection with the proposed Settlement of the Action.¹ I submit this
8 Declaration as a supplement to my previously filed declaration, the Declaration of
9 Ed Barrero Regarding: (A) Mailing of Postcard Notice and Notice; (B) Posting of
10 Notice and Claim Form on Settlement Website; and (C) Publication of Summary
11 Notice dated June 16, 2020 (ECF No. 523-3) (the “Initial Mailing Declaration”). The
12 following statements are based on my personal knowledge and information provided
13 to me by other Epiq employees working under my supervision and, if called on to
14 do so, I could and would testify competently thereto.

15 **CONTINUED DISSEMINATION OF NOTICE**

16 2. Since the execution of my Initial Mailing Declaration, Epiq has mailed
17 225 additional copies of the Notice and Claim Form (together, the “Notice Packet”)
18 in response to requests from potential Class Members. Epiq has not received any
19 additional requests for Postcard Notices. Therefore, through July 13, 2020, Epiq has
20 mailed a total of 16,597 Postcard Notices and 4,469 Notice Packets to potential Class
21 Members and nominees.

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25 ¹ Unless otherwise defined herein, all capitalized terms shall have the same
26 meanings as set forth in the Stipulation and Agreement of Settlement dated February
27 10, 2020 (ECF No. 516-3).

1 to or on the claims submission deadline. Accordingly, Epiq anticipates receiving
2 additional claims for this matter in the coming days.

3 5. In connection with Class Counsel’s motion for distribution of the Net
4 Settlement Fund, Epiq will provide the Court with the results of this administration,
5 including the total number of Claim Forms received and the total recognized losses
6 represented by those claims.

7 I declare under penalty of perjury under the laws of the United States of
8 America that the foregoing is true and correct to the best of my knowledge.

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10 Executed on July 14, 2020, at Lake Success, NY.

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Ed Barrero

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